

NOWALSKY, BRONSTON & GOTHARD

A Professional Limited Liability Company

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Philip R. Adams, Jr.

February 27, 2009

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: Annual Customer Proprietary Network Information Compliance
Certification; EB Docket No. 06-36.

Dear Ms. Dortch:

Please find attached the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for Mountain Communications, LLC. Please feel free to call me if you have any questions regarding this filing.

Sincerely,



Leon Nowalsky

LLN/cdp

Attachment

**STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION**

1. It is Mountain Communications' LLC's dba Procom policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer's consent prior to using CPNI.
2. Mountain Communications L.L.C. follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or Mountain Communication L.L.C. However, Mountain Communications' LLC cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
 - A. If an unauthorized disclosure were to occur, Mountain Communications' LLC shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
 - B. Mountain Communications' LLC shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
 - C. Notwithstanding the provisions in subparagraph B above, Mountain Communications' LLC shall not wait the additional seven (7) days to notify its customers if Mountain Communications' LLC determines there is an immediate risk of irreparable harm to the customer.
 - D. Mountain Communications' LLC shall maintain records of discovered breaches for a period of at least two (2) years.
3. All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with the Mountain Communications' LLC and annually thereafter.
 - A. Specifically, Mountain Communications' LLC shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
 1. When the customer has provided a pre-established password.
 2. When the information requested by the customer is to be sent to the customer's address of record, or

3. When Mountain Communications' LLC calls the customer telephone number of record.
4. When the customer is able to provide call detail information without the assistance of the Mountain Communications' LLC representative. Discussion is limited to the specific call detail provided by customer.
4. Prior to allowing access to Customers' individually identifiable CPNI to our joint ventures or independent contractors, we will require, in order to safeguard that information, their entry into both confidentiality agreements that ensure compliance with this Statement.
5. Mountain Communications' LLC does not market or otherwise sell CPNI information to any third party.

STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION

Annual 64.2009 (e) CPNI Certification for 2009

Date filed: March 1, 2009

Name of company covered by the certification: Mountain Communication DBA Procom

Form 499 Filer ID: 822894

Name of signatory: Larry Sisler

Title of signatory: Managing Member

I, Larry Sisler, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

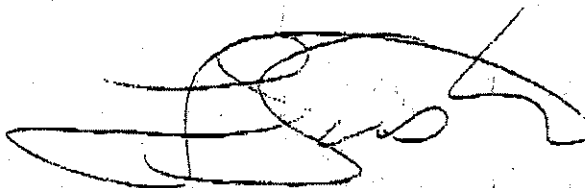
Signed _____



ANNUAL OFFICER'S CERTIFICATION
REGARDING ACTIONS AND COMPLAINTS

Larry Sisler, Affiant, certifies, affirms, deposes and says that:

1. He is Managing Member of Mountain Communications' LLC. ("Procom");
2. That he is authorized to and does make this Certification for Mountain Communications' LLC
3. That he has personal knowledge of Mountain Communications' LLC CPNI operating procedures and what has transpired with respect to Mountain Communications' LLC CPNI obligations for this past year;
4. That based upon his knowledge, information and belief he certifies as follows:
 - A. For the year ended March 1, 2009 Mountain Communications' LLC has not received any complaints from consumers regarding unauthorized disclosure of CPNI.
 - B. For the year ended March 1, 2009 Mountain Communications' LLC has not taken any actions against data brokers.



Date: 2/26/09